REMARKS/ARGUMENTS

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. This communication is believed to be fully responsive to all issues raised in the 3/23/05 Office Action.

CLAIM REJECTIONS §102

Claims 26, 28 and 29 are rejected under §102(e) as being anticipated by US patent No. 6,557,033 to Maeda (hereinafter "Maeda").

Claims 1-26, 28 and 29 are rejected under §102(e) as being anticipated by US patent No. 6,526,516 to Ishikawa (hereinafter "Ishikawa").

Claims 26, 28, 29, and 30-32 are rejected under §102(b) as being anticipated by US patent No. 6,526,516 to Sekine (hereinafter "Sekine").

Claim 1 is directed to a system for use with an electronic appliance configurable for use with an IEEE 1394 serial bus, comprising:

- an IEEE 1394 compliant electrical device; and,
- a circuit electronically coupled with said electrical device and configured to cause a reset signal to be generated when the electronic appliance experiences a power supply failure;
- wherein said electrical device and said circuit are configured to be coupled with the IEEE 1394 serial bus and the electronic appliance.

Claim 1 recites a circuit electronically coupled with the electrical device and configured to cause a reset signal to be generated when the electronic appliance experiences a power supply failure.

Ishikawa describes a power control system and method utilizing an integrated signal line connector/power line connector connecting devices within a system to make possible the use of a single common cable. Col. 2, lies 55-61. As noted by the Office, Col. 19, lines 25-50 describe bus reset scenarios under the sub-heading "Bus-Reset sequence" which is reproduced below.

> The respective devices (nodes) connected to the 1394 serial bus are provided with a node ID, and are recognized as nodes constructing the network. For example, when increase/decrease of the number of nodes due to connection/disconnection or power ON/OFF status of network devices, i.e., network construction changes and it is necessary to recognize a new network construction, the respective nodes detect the change of network construction, send a bus-reset signal onto the bus, and enter a mode for recognizing the new network construction. The detection of change of network construction is made by detecting change of bias voltage at the connector port 810.
>
> When the bus-reset signal is sent from one node, the physical layer 811 of the respective nodes receives the bus-reset signal, and at the same time, notifies the link layer 812 of the occurrence of bus reset, and forwards the bus-reset signal to the other nodes. When all the nodes have received the bus-reset signal, a bus-reset sequence is started. Note that the bus-reset sequence is started when the cable is attached/detached, or the hardware unit 800 has detected network abnormality or the like. Further, the bus-reset sequence is also started by a direct instruction to the physical layer 811 such as host control by a protocol. As the bus-reset sequence is started, data transfer is suspended during the bus reset, and after the bus reset, the data transfer is restarted in the new network construction. Col. 19, lines 25-50.

The Office contends that the described bus-reset signal upon "power on/off status of network devices" describes the limitation of a "reset signal to be generated when the electronic appliance experiences a power supply failure". Applicant respectfully disagrees with the Office's position that a "power on/off status" is the same as an "electronic device experience[ing] a power supply failure. For purposes of clarification, consider the following example. A power on/off status changes when a user turns a device on or off, such as through a device power button. In such an instance, power is still available to the functional components of the device, such as the processor. So for instance, utilizing the available power from the power supply, the processor, or other component, can send a powering off message to other system components indicating that the device is going from an active state to an inactive state. The remaining system devices can then take appropriate action, such as causing a reset to establish a new system configuration. Such a scenario relies upon maintaining a power supply to the processor of the device which is powering off. In contrast, if the power supply of a device experiences a power supply failure, such as if the plug is accidentally kicked-out of the socket, no power is available for the device's processor to send a status to the other network components. Ishikawa does not contemplate such a scenario much the less teach the solution of "caus[ing] a reset signal to be generated when the electronic appliance experiences a power supply failure" recited in claim 1. At least for this reason, Ishikawa does not teach or describe the limitations of claim 1 and as such

inherently can not anticipate claim 1. As such, Applicant respectfully requests that the §102 rejection of claim 1 based upon Ishikawa be withdrawn.

Claim 2 depends from allowable claim 1 and is allowable for at least the reasons described above in relation to claim 1. Further, the Office contends that "it is clear that the electrical device of Ishikawa, as in any digital device, comprises an integrated circuit." Applicant respectfully disagrees with the Office's assertion. Applicant respectfully reminds the Office that digital devices can be made from many other components besides integrated circuits. As such, Applicant expressly requests that the Office point out with particularity the location of the support in Ishikawa which supports the Office's position or withdraw the rejection of claim 2.

Claims 3-6 depend from allowable claim 1 and are similarly allowable over Ishikawa. As such, Applicant respectfully requests that the §102 rejection of claims 3-6 based upon Ishikawa be withdrawn and that claims 3-6 be allowed.

Claim 7 depends from allowable claim 1 and is allowable for at least the reasons described above in relation to claim 1. Further, the Office contends that "it is clear that the circuit of Ishikawa, as in any digital circuit, comprises an integrated circuit. Applicant respectfully disagrees with the Office's assertion. Applicant respectfully reminds the Office that digital circuits can be made from many other components besides integrated circuits. As such, Applicant expressly requests that the Office point out with particularity the location of the support in

Ishikawa which supports the Office's position or withdraw the rejection of claim 7.

Claim 8 and its dependent claims 9-12 are similarly related to device power supply failure. Claim 8 recites a "circuit is configured to be coupled with the IEEE 1394 network and the electronic appliance, wherein said circuit is configured to cause a reset signal to be generated when the electronic appliance experiences a power supply failure, and wherein said reset signal causes the network to reset" which is not described or contemplated in Ishikawa. As such, Applicant respectfully requests that the §102 rejection of claims 8-12 be withdrawn.

Further, with respect to claims 9-11, and as mentioned above in relation to claims 2 and 7, Applicant respectfully requests that the Office call out with particularity the support in the reference for the Office's position or withdraw the rejection of claims 9-11.

Claim 13 is directed to a system for communicably coupling plural electronic appliances comprising:

- an IEEE 1394 compliant serial bus; and,
- at least one circuit containing one or more IEEE 1394 compliant electrical devices; wherein said at least one circuit is configured to be coupled with the IEEE 1394 compliant serial bus and one or

more of said plural electronic appliances, wherein said circuit is configured to cause **an appliance reset signal to be generated in an event that an individual appliance experiences a power supply failure but remains connected to the serial bus**, and wherein said appliance reset signal causes the IEEE 1394 serial bus to reset.

Ishikawa, as described above in relation to claim 1, in no way contemplates causing an appliance reset signal to be generated in an event that an individual appliance experiences a power supply failure but remains connected to the serial bus. Since Ishikawa does not teach each and every claim element Ishikawa cannot anticipate claim 13. As such claim 13 is allowable over the art of record.

Claims 14-20 depend from allowable claim 13 and are similarly allowable.

Further, with respect to claims 14-15, and as mentioned above in relation to claims 2 and 7, Applicant respectfully requests that the Office call out with particularity the support in the reference for the Office's position or withdraw the rejection of claims 14-15.

Claim 21 and its dependents 22-24 are similarly related to device power supply failure as described above in relation to claims 1 and which is not

described or contemplated in Ishikawa. As such, Applicant respectfully requests that the §102 rejection of claims 21-24 be withdrawn.

Claim 25 is similarly related to power supply failure as described above in relation to claim 1 and which is not described or contemplated in Ishikawa. As such, Applicant respectfully requests that the §102 rejection of claim 25 be withdrawn.

Claim 26 is directed to a method of operating electronic appliances, comprising:

- monitoring a status of a power supply of an electronic appliance coupled to a data transfer network and wherein said power supply is not transferred over said data transfer network; and,
- transmitting a signal on the data transfer network when said status changes.

Ishikawa in no way contemplates monitoring a status of a power supply of an electronic appliance. Instead, , as mentioned above in relation to claims 1, Ishikawa relies upon an expectation of a constant power supply to a device to achieve its system functionality.

Maeda discloses a system for making a host computer automatically recognize a composite apparatus configured to switch from one functionality to another. A device (100) communicating with a host (102) temporarily stops its

own power data cable in order to have the host think that the device is disconnected from the data cable. This causes the host to delete the device's driver. After a predetermined time the device restarts its supply of power to the data cable which causes the host to recognize the device as a new device and to therefore install a (new) driver for what the host perceives as a new device. (Maeda, abstract).

Maeda in no way contemplates monitoring a status of a power supply of an electronic appliance coupled to a data transfer network and wherein said power supply is not transferred over said data transfer network. To the contrary Maeda describes total reliance upon a continuous power supply to a device for its system for establishing "a pseudo state of disconnection of the device" from the network to function. Col. 6 lines 31-32.

Sekine relates to a local power supply failure detection and clock disabling circuit operating within a node coupled to a bus structure.

> The node includes multiple ports and physical connections for supporting multiple applications. Each physical connection serves as a bus transceiver for receiving and transmitting communications over the bus structure. The node includes a local power supply and a clock signal which is provided to each of the physical connections within the node. A detection circuit is coupled to the local power supply for detecting whether or not a sufficient level of power is being supplied from the local power supply. The clock signal is always provided to a master physical connection within the node, which is responsible for repeating communications across the bus structure. The master physical connection draws power from the backup power supply source when the local power supply is not supplying a sufficient level of power. When the detection circuit has detected that the local power supply is not supplying a sufficient level of power, the clock signal is disabled to

all of the physical connections within the node, except the master physical connection, in order to minimize power consumption of the node. The local applications coupled to the node are also disabled when a sufficient level of power is not supplied from the local power supply. When the detection circuit detects that the local power supply is again supplying power at a sufficient level, the clock signal is reenabled to all of the physical connections within the node and the local applications are also reenabled. Abstract.

Applicant respectfully notes that throughout prosecution of the present application, the Office has maintained that the claimed subject matter is already addressed and disclosed by the IEEE 1394 specification. Yet, the Office now cites Sekine as a reference against the claimed subject matter even though Sekine recognizes, describes, and claims a solution to the same problem described by the Applicant. The USPTO has issued a patent in Sekine which describes a solution to a problem that the Office continues to insist does not exist. At least the abstract, summary and claim set including claims 4-10 describe providing to at least some portions of a node "power from the backup power supply source when the local power supply is not supplying a sufficient level of power" to maintain data flow through the node. The Sekine Patent as issued by the USPTO is inconsistent with the Office's contention that the 1394 specification specifies that a power supply failure to a node automatically causes a system reset. Sekine recognizes that if a sufficient power level is not maintained to the master physical layer that data cannot flow through the node resulting in a system failure The present application addresses the same issue recognized by Sekine, namely avoiding system failure due to a power supply failure to a system device. In

contrast to Sekine, which relies on a back-up power source to maintain some degree of data transfer through the afflicted device, the present application takes an action which produces a system reset and resultant self-IDs to be generated by all functioning system devices. As a result, the system is reconfigured at the exclusion of the device experiencing the power failure and thereby maintains normal system data transfer capabilities.

Claims 28-29 depend from allowable claim 26 and are similarly allowable.

Claim 30 is directed to a method of operating electronic appliances, comprising:

- coupling at least one appliance to a data transfer network;
- receiving power for the appliance from a primary power supply which is separate and distinct from the data transfer network;
- detecting a failure of the primary power supply; and,
- responsive to said detecting, switching a physical layer of the appliance to a secondary power supply received from the network.

Ishikawa does not contemplate "detecting a failure of the primary power supply" or "responsive to said detecting, switching a physical layer of the appliance to a secondary power supply received from the network" and by definition cannot anticipate claim 30.

Sekine does not describe "responsive to said detecting, switching a physical layer of the appliance to a secondary power supply received from the network" and by definition cannot anticipate claim 30. As such claim 30 is allowable over the art of record.

Claims 31-32 depend from allowable claim 30 and are similarly allowable.

CONCLUSION

Claims 1-26, and 28-32 are believed to be in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate issuance of the application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

Respectfully Submitted,
Lee & Hayes, PLLC
421 W. Riverside Avenue, Suite 500
Spokane, WA 99201

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Paul Mitchell
Reg. No. 44,453
Phone No. (509)324-9256x237